



## NAVAJO COUNTY Human Resources



<b>Reference: Personnel Policies Manual SECTION 5.4 Safety</b>	<b>Procedures: Hazard Communications</b>
<b>Document No: HR-Safety 05/06-024</b>	<b>Effective Date: March 15, 2006</b>

### HAZARD COMMUNICATION PROCEDURES (Employee Right To Know)

#### Procedures Description

Navajo County has developed this Hazard Communication Procedure (HCP) in response to the OSHA Hazard Communication Standard to help ensure the health and safety of all County employees working with or around chemical substances.

The Hazard Communication Standard, OSHA 29 CFR 1910.1200 requires employers using chemicals or other potentially hazardous materials to establish, implement, and maintain an HCP. For the remainder of this document we will refer to the HCP exclusively, understanding that this Procedure satisfies the regulation.

The HCP is intended to:

- Identify all hazardous materials used in a workplace
- Determine those employees using or exposed to these materials
- Train these employees in the hazards of the chemicals or hazardous materials and provide access to Material Safety Data Sheets (MSDS) for each substance

Additionally,

- All hazardous materials must be properly labeled using the County's Chemical Labeling Procedure. See Appendix A for examples of mandatory HMIG Labels and HMIG Reference Guide
- This written HCP must be available and reviewed by all employees

## **Approach**

This HCP establishes uniform requirements to ensure all chemicals used in County workplaces are evaluated for potential hazards. The purpose of this HCP is to establish guidelines and policies to ensure all members of the County are apprised of the chemical hazards they may be exposed to, and provide a foundation of knowledge to permit employees to make informed decisions about these materials. The safe conduct of work with potentially hazardous chemicals is dependent upon the value the County and each employee places on protecting health and the environment. Effective implementation of chemical safety relies on the motivation and good judgment that each chemical user exercises. Therefore, it is the responsibility of Elected Officials, Department Directors, Supervisors, employees and contractors, to adhere to the specifics and the intent of the HCP in order to reduce risk to the County as a whole and promote safety as a value in the County culture.

The intention of the County HCP is to transfer knowledge and capabilities into each employee and department in order to be effective. Navajo County has adopted an approach to implementing and maintaining the HCP by having each Elected Official or Department Director designate and support safety representatives in his or her department. The Department Representatives will be trained by the HR/Safety Analyst or designee to a degree that will enable them to conduct their responsibilities. The department representatives are then responsible for implementing the procedure within their departments under the direction of their Elected Official or Department Director. Each representative will implement the procedure based on the specific needs of the department. These needs will vary according to potentially hazardous materials used, number of employees, resources, and other variables. Each Supervisor will bear the direct responsibility for compliance with the procedure requirements.

## **Written HCP**

This document, the Navajo County HCP, fulfills the requirement of the OSHA regulation for a written program, as well as serving as the overall procedure document for the County. The Navajo County Sheriff's Department and Health Department maintain additional procedures to protect their personnel from the hazards of drug labs and/or terrorist activities. It is the intent of this document to assist and guide the Department Representatives in their efforts to implement the procedure within their department, as well as to establish a consistent approach for all County Departments in addressing this procedure.

## Scope

The OSHA Hazard Communication regulation applies to all employers whose employees may be exposed to hazardous substances. All hazardous substances found in the workplace under normal or reasonably foreseeable emergency conditions (i.e., spill or release of a chemical) are included, with the following exceptions:

- Tobacco products
- Untreated wood products (or wood dust)
- Articles (manufactured items; not excluded are hazardous substances used in the articles)
- Food, drugs and cosmetics used by employees
- Pesticide use regulated by the Department of Food and Agriculture (although similar requirements exist under the jurisdiction of the Agricultural Commissioner's Office)
- Consumer products sold at retail, unless employee exposure is greater than exposure to the ordinary consumer (e.g., cleaning products in the workplace are regulated by Hazard Communication)

Also, additional labeling is not required on hazardous materials for:

- Pesticides
- Food, drug and additive products
- Consumer products

**Note:** Consumer products packaged for and used by the general public, and used in a manner that will not result in significantly greater exposure than that of the general consumer, are excluded from the procedure. However, the County requires employees to inform their Supervisors when these materials are brought into the workplace. These materials shall be noted on the Departments chemical inventory.

## PURPOSE

The Hazard Communication Procedure establishes methods for providing information regarding hazardous materials in the workplace as required by OSHA 29 CFR 1910.1200.

This procedure discusses requirements for the use of hazardous material labels and other hazard warning methods, Material Safety Data Sheets (MSDSs), hazardous materials evaluations, annual inventories, and employee information and training on hazardous materials / chemicals. The procedure will ensure that:

- Employees have proper training and awareness of hazardous materials in the workplace.
- Material Safety Data Sheets (MSDS) are on file for employee access.
- Proper posting and container labeling are accomplished.

## **RESPONSIBILITIES**

This Procedure applies to all employees, including contract employees under the direct supervision of the County, who may come in contact with or be exposed to hazardous materials at the workplace while performing their normal duties or during emergency conditions. It also applies to those who are involved in the purchase, transportation, or storage of hazardous materials. Spill response and reporting is the responsibility of the County Emergency Manager.

### **Elected Officials & Department Directors shall:**

- A. Provide training, document that training, and provide copies of training records to Human Resources. The Supervisors Training form HR-Safety 05/06-009 shall be used.
- B. Ensure a chemical inventory is kept current and provided for all potentially hazardous materials / chemicals in the workplace. The County chemical inventory form HR-Safety 05/06-023 shall be used for this purpose.
- C. Ensure that MSDSs are readily available and the locations of MSDS information are identified to employees.
- D. Evaluate the hazard potential of new hazardous materials being introduced into the workplace and recommend safer alternatives, if available.
- E. Minimize the amount and number of chemicals used in the workplace.
- F. Provide guidance for labeling of hazardous material containers.
- G. Ensure workplace inspections include evaluations of hazardous material safe handling and storage practices. The County Chemical Safety Checklist HR-Safety 05/06-021 shall be used for this purpose.

### **Supervisors Shall:**

- A. Identify the hazardous materials normally associated with jobs under their supervision and make sure their employees receive the appropriate Hazard Communication training (both general and specialized) before they begin any work assignment involving hazardous materials.
- B. Notify management regarding the use of new hazardous materials.
- C. Notify management regarding new uses for existing hazardous materials.
- D. Ensure personnel employ the protective measures prescribed by MSDSs and department standard operating procedures when working with hazardous materials.
- E. Ensure personnel use, transport, and store hazardous materials in a safe manner.
- F. Ensure hazardous material containers are labeled properly (including portable containers). The County has adopted the HMIG chemical labeling format. Labels are available from Human Resources.
- G. Ensure current MSDSs are available for the hazardous materials used and that current copies are forwarded to Human Resources.

### **Employees Shall:**

- A. Familiarize themselves with hazard warnings, hazard labels, and MSDSs so they can use this information where needed.
- B. Employ the protective measures prescribed by MSDSs and department standard operating procedures when working with hazardous materials.

### **CONTRACTOR REQUIREMENTS**

Contractors are required to have their own Hazard Communication Procedure. However, the County must provide the contractors with information specific to County operations. The contractors must, in turn, convey this information to their employees.

Contractors bringing hazardous materials/chemicals into County work spaces must provide the County with MSDS sheets and information about the

chemicals. If portable containers are not labeled the County hazardous materials labeling format shall be followed.

## TRAINING

### A. Initial Training

For employees whose duties require them to work around hazardous materials, initial training shall be provided by their Department before they begin their work assignment. This training shall cover the following topics:

1. Overview of Hazard Communication regulations, including employees' rights under the regulations.
2. Operations in the work area where hazardous materials are present.
3. How to read warning labels and identify the presence or release of hazardous materials.
4. Emergency procedures for spills/accidents, including fire hazards, first aid, clean-up, and disposal.
5. Location and availability of this Hazard Communication Procedure, including hazardous materials lists and MSDSs.
6. How to read an MSDS and use it to identify (at a minimum):
  - (a) Physical and Health Hazards
  - (b) First Aid Procedures
  - (c) Protective Measures
  - (d) Storage and Handling Procedures
  - (e) Spill Response Procedures

### B. Training for Non-Routine Tasks

Periodically, employees may be required to perform non-routine tasks which may involve hazardous materials. Before starting work on such

projects, affected employees shall be given information by their supervisor about the hazards to which they may be exposed.

C. Specialized Training

Specialized training shall also be provided on an as-needed basis as new hazards are introduced into the workplace and for hazards that are newly discovered (e.g., from revised MSDS information).

D. Recurring Training

On-going training will be provided to employees. The frequency of this training should be designed to maintain a heightened level of hazardous material awareness. Hazardous Material awareness training should be conducted as required by ADOSH and OSHA regulations.

## **HAZARDOUS MATERIAL INFORMATION**

- A. All purchases of hazardous materials / chemicals / paints / lubricants / fuels must include a current MSDS with every delivery. (In some limited cases an exemption may be granted by the HR/Safety Analyst.) A copy of the MSDS must be sent to Human Resources.
- B. A list of workplace hazardous materials shall be filed in MSDS binders located in each facility. Examples of HMIG Labels and the HMIG Reference Guide shall be maintained in the MSDS Binder.
- C. MSDSs are also located on the County's internal web page in the Safety section.

## **WARNINGS & LABELING**

- A. All containers of hazardous materials / chemicals are to be labeled with the following information:
  - 1. Complete identity of the material.
  - 2. Appropriate hazard warning and safety precautions.
  - 3. First aid measures.
  - 4. Name and address of the manufacturer or other responsible party.

- B. Secondary containers must be labeled with either a copy of the original label or the HMIG label system adopted by the County. (See Appendix A for examples.) HMIG labels are available outside the HR/Safety Analyst office at the Governmental Complex.
- C. NFPA 704 warning labels shall be placed on the entrances to buildings containing ten (10) gallons or more of flammable or hazardous materials.
- D. All warnings and labels must be legible, in English, and prominently displayed on containers.
- E. A Hazard Rating Index Guide shall be posted near where chemicals are stored and in janitorial closets.



# **APPENDIX A**

# **HMIG EXAMPLES**